### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

SOLAS OLED LTD.,	)
Plaintiff,	) Civil Action No. 6:19-CV-00515-ADA
V.	)
GOOGLE LLC,	)
Defendant.	)

#### **JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff, with Defendants' agreement, respectfully submits the attached proposed Protective Order for the Court's signature.

Dated: April 13, 2020 /s/ Reza Mirzaie

Marc Fenster (CA SB No. 181067) Reza Mirzaie (CA SB No. 246953) Neil A. Rubin (CA SB No. 181067) Kent N. Shum (CA SB No. 259189) RUSS AUGUST & KABAT 12424 Wilshire Boulevard 12th Floor Los Angeles, California 90025 Telephone: 310-826-7474 Facsimile: 310-826-6991

Facsimile: 310-826-6991
E-mail: mfenster@raklaw.com
E-mail: nrubin@raklaw.com
E-mail: kshum@raklaw.com

Sean A. Luner
CA State Bar No. 165443
Gregory S. Dovel
CA State Bar No. 135387
Jonas B. Jacobson
CA State Bar No. 269912
DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, CA 90401

Telephone: 310-656-7066 Email: sean@dovel.com Email: greg@dovel.com Email: jonas@dovel.com

T. John Ward, Jr.
Texas State Bar No. 00794818
E-mail: jw@wsfirm.com
Claire Abernathy Henry
Texas State Bar No. 24053063
E-mail: claire@wsfirm.com
Andrea L. Fair
Texas State Bar No. 24078488
E-mail: andrea@wsfirm.com
WARD, SMITH & HILL, PLLC
PO Box 1231
Longview, Texas 75606-1231
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)

# ATTORNEYS FOR PLAINTIFF SOLAS OLED, LTD.

By /s/ Michael E. Jones

Dated: April 13, 2020

Michael E. Jones SBN: 10929400 POTTER MINTON, PC 110 North College, Suite 500 Tyler, Texas 75702 Telephone: (903) 597-8311 Facsimile: (903) 593-0846 mikejones@potterminton.com

Brian M. Cook O'Melveny & Myers LLP 400 South Hope Street, 18th Floor Los Angeles, CA 90071-2899 213-430-6000 Fax: 213-430-6407 Email: bcook@omm.com

Nicholas J. Whilt O'Melveny & Myers LLP 400 S. Hope St., 18th Floor Los Angeles, CA 90071 (213) 430-6000

Fax: (213) 430-6407 Email: nwhilt@omm.com

Darin W. Snyder O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111-3823 415-984-8846 Fax: 415-984-8701

Email: dsnyder@omm.com

David S. Almeling O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111-3823 415-984-8700 Fax: 415-984-8701

Email: dalmeling@omm.com

Ryan K Yagura O'Melveny & Myers - LA 400 South Hope Street, 18th Floor Los Angeles, CA 90071-2899 213-430-6189 Fax: 213-430-6407

Email: ryagura@omm.com

Mark Liang O'Melveny and Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 415-984-8700 Fax: 415-984-8701

Email: mliang@omm.com

Eric Y. Su O'Melveny & Myers LLP 400 South Hope Street, 18th Floor Los Angeles, CA 90071 213-430-6000 Fax: 213-430-6407

Email: esu@omm.com

### ATTORNEYS FOR DEFENDANT, **GOOGLE LLC**

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on April 13, 2020.

/s/ Reza Mirzaie
Reza Mirzaie